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December 7, 2005

**VIA ELECTRONIC FILING**

Honorable Sue L. Robinson  
J. Caleb Boggs Federal Building  
844 N. King Street  
Room 6124  
Lockbox 31  
Wilmington, DE 19801

**Re: C.A. No. 04-1199-SLR**  
***SRI International, Inc. v. Internet Security Systems, a Georgia corporation, Internet Security Systems, Inc., a Delaware corporation, and Symantec Corporation.***

Dear Chief Judge Robinson:

In advance of the in-person discovery status conference in C.A. No. 04-1199-SLR scheduled for today at 4:30 p.m., the parties submit the following list of proposed discovery issues for the Court's consideration.

***SRI International, Inc. ("SRI"):***

- Whether Symantec should be required to provide customer information.
- Symantec's objections to providing information regarding its intrusion detection, prevention, and/or analysis products that have not been specifically identified as "accused products."

***Internet Security Systems, Inc., a Georgia corporation ("ISS-GA") and Internet Security Systems, Inc., a Delaware corporation ("ISS-DE"):***

- Whether the confidential designations on certain documents produced by SRI are proper.

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- Whether SRI should be required to supplement its response to ISS-GA's Interrogatory No. 7 concerning conception of the alleged inventions of the patents-in-suit.
- Whether SRI should be required to supplement its response to ISS-GA's Interrogatory No. 8 concerning the commercialization of the alleged inventions of the patents-in-suit.
- Approval of the parties' stipulation that adding and responding to additional allegations of inequitable conduct may be done through supplementation of interrogatory responses without formal amendment of the pleadings.
- Whether the December 30, 2005 deadline for motions to amend the pleadings should be extended with respect to adding further allegations of inequitable conduct.

*Symantec Corporation ("Symantec"):*

- Whether SRI should be required to supplement its response to Symantec's Interrogatory No. 4 concerning conception of the alleged inventions of the patents-in-suit.
- Whether Symantec should be required to provide discovery on products for which SRI has failed to provide infringement contentions in response to Symantec's Interrogatory No. 13.

*Respectfully submitted,*

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